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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

ALICIA INES MOYA GARAY, JUAN  
JAIME LOPEZ-JIMENEZ, and ARRIBA  
LAS VEGAS WORKER CENTER,

Plaintiffs,

vs.

CITY OF LAS VEGAS, UNITED STATES  
IMMIGRATION AND CUSTOMS  
ENFORCEMENT, et al.,

Defendants.

Case No.: 2:20-cv-00119-ART-EJY

**ORDER GRANTING**

STIPULATION FOR EXTENSION OF  
TIME FOR BRIEFING OF FEDERAL  
DEFENDANTS' MOTION TO DISMISS  
(FIRST REQUEST)

**STIPULATION AND ORDER FOR EXTENSION OF TIME FOR BRIEFING OF  
FEDERAL DEFENDANTS' MOTION TO DISMISS**

Plaintiffs Alicia Ines Moya Garay, Juan Jaime Lopez-Jimenez, and Arriba Las Vegas Worker Center (“Plaintiffs”) and Defendants United States Immigration and Customs Enforcement (“ICE”), Tae D. Johnson, and Michael Bernacke (“Federal Defendants”), by and through their respective counsel of record, hereby stipulate as follows:

On October 16, 2024, the Court granted the parties Stipulated Discovery Plan and Scheduling Order, which included a deadline for Plaintiffs to file a fourth amended complaint and for Defendants to file their response (December 17, 2024) (Dkt. No. 141);

On November 5, 2024, the Court docketed Plaintiffs’ Fourth Amended Complaint (Dkt. No. 144);

On December 17, 2024, Federal Defendants filed a Motion to Dismiss Plaintiffs’ Fourth Amended Complaint (Dkt. No. 148), which automatically set Plaintiffs’ response deadline as December 31, 2024;

The Parties have conferred and agreed to a 30-day extension of Plaintiffs’ deadline to respond to the Motion to Dismiss from December 31, 2024, to January 30, 2025, to allow counsel for Plaintiffs sufficient time to prepare such response given the topics raised by the motion to dismiss and due to the intervening holidays;

The Parties have conferred and agreed to a 30-day extension of Federal Defendants’ deadline to file a reply to Plaintiffs’ response from February 6, 2025 (seven days – under LR 7-2(b) – after Plaintiffs’ new deadline), to March 10, 2025 (the next Monday after 30 added days);

The filer of this document attests that the concurrence in the filing of this document has been obtained from counsel for Federal Defendants under LR IC 5-1(d);

No trial date has been set for this action, the extension requested is not intended for

1 purposes of delay, and no party will be prejudiced by the extension requested.

2 This is the first request for extension of time in this matter.

3 The Parties respectfully request that, for good cause shown, the Court enter an order  
4 extending Plaintiffs' deadline to respond to the Motion to Dismiss by thirty (30) days to January  
5 30, 2025, and extending Federal Defendants' deadline to file a reply by thirty (30) days to March  
6 10, 2025.

7 The Parties stipulate and agree, through their undersigned counsel, subject to the Court's  
8 approval, that Plaintiffs will have until January 30, 2025, to file their response to the Motion to  
9 Dismiss, and that Federal Defendants will have until March 10, 2025, to file their reply in support  
10 of their motion.

11 Respectfully submitted,

13 Dated: December 20, 2024

**MEXICAN AMERICAN LEGAL DEFENSE  
AND EDUCATIONAL FUND**

15 */s/ Ernest Herrera*

16 Ernest Herrera

17 Luis L. Lozada

Leticia M. Saucedo

18 MEXICAN AMERICAN LEGAL DEFENSE  
AND EDUCATIONAL FUND

19 F. Travis Buchanan

F. TRAVIS BUCHANAN, ESQ.,  
& ASSOC., PLLC

21 *Attorneys for Plaintiffs*

22 Dated: December 20, 2024

**U.S. DEPARTMENT OF JUSTICE**

23 */s/ J. Max Weintraub*

24 Brian M. Boynton

August E. Flentje

J. Max Weintraub

25 U.S. DEPARTMENT OF JUSTICE  
CIVIL DIVISION

27 *Attorneys for Federal Defendants*

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2 IT IS SO ORDERED:  
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6 Anne R. Traum  
7 United States District Judge  
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10 DATED: December 23, 2024  
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